



July 15, 2015

Ms. Jan Palumbo (AWT-150)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

WA 3019
14F
7-15-15
Received
JUL 19 2015
Office of Air, Waste & Toxics

**Subject: June/July 2015 Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the June/July 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from June 15, 2014, to July 14, 2015.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period with two wells extracting groundwater (EW-2 and EW-4). No high-alarms were received during the month so we can assume that the wells continue to pump at the reduced pumping rates. No visits were made to the Site during this period.
- The Work Plan for the iSOC installation and Rehabilitation of the Recirculation System was submitted to EPA on May 18, 2015. GSI held two conference calls in June with EPA to discuss the work plan. Revisions were made to the work plan per EPA comments and the Revised Final Work Plan was submitted on June 29, 2015. EPA approved the Work Plan verbally on a conference call on June 26, 2015.

ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system (recirculation system) during the next reporting period; however, until the system is rehabilitated, it is expected that its performance will continue to be below optimum. After the trench rehabilitation, wells will be turned on systematically until all wells are operating at the capacity of the trench.
- Baxter will conduct the rehabilitation of the trench in July (July 29-31, 2015) as well as install the iSOCs into 3 intermediate wells.



FILE COPY

- A summary of the work will be included in the July/August Progress report with full as-built and pumping details in the Second Half 2015 Semi-Annual Report.

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- No testing was conducted in the past month.

CERTIFICATION

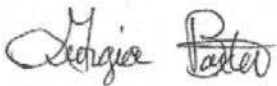
I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

Name: Georgia Baxter
Title: Chief Executive Officer
Date: April 8, 2015

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter
Chief Executive Officer

cc: Jeanne Tran, Ecology
Jamie Hillery, Stella-Jones Corp.
RueAnn Thomas, Nattura Group

